

DISTRICT OF COLUMBIA WATER AND SEWER AUTHORITY

5000 OVERLOOK AVENUE, S.W., WASHINGTON, D.C. 20032

December 1, 2005

Anthony Meadows
Acting Chief, Safe Drinking Water Act Branch
United States Environmental Protection Agency
Region III
1650 Arch Street
Mail Code: 3WP32
Philadelphia, PA 19103-2029

Re: Administrative Order, Paragraph #63

Plan for Update of Materials Evaluation and Lead Service Inventory

First Quarterly Status Report

Dear Mr. Meadows:

In accordance with Administrative Order for Compliance on Consent (Docket No. SDWA-03-2004-0259DS), Paragraph 63, and DC WASA's plan submitted September 1, 2005 and approved by EPA, the following is the first 2006 quarterly status report.

The submission of this report, however, is not intended as a concession or agreement that compliance with Paragraph 63 is an ongoing requirement once the 90th percentile of DC WASA's lead concentration is below the LCR action level for two consecutive six-month monitoring periods.

As stated in DC WASA's plan, we propose to determine the materials of construction of a minimum of 12% of the unknowns a year through September 1, 2014 both through the replacement program as well as by supplemental test pitting.

As submitted, the inventory of remaining unknowns is 21,773. Therefore:

 $21,773 \times .12 = 2613$ unknowns must be identified by test pit, either during the block contracts of 2006, or by supplemental test pitting.

To date this quarter, 600 unknowns have been identified, 520 during our block replacement program and 80 via test pit investigations. We project that 1050 additional unknowns will be identified during the 2006 replacement program by September 30, 2006 for a total of 1650 unknowns identified. We plan to do another 963 supplemental test pits to meet the goal for the year.

Therefore,

600 actual to date for FY2006

1,050 expected during continuing by-block replacement program

963 planned supplemental test pits

2,613 Projected unknown material services identified in FY2006

We will carefully monitor the number of unknowns as the work progresses, and provide additional quarterly reports and a summary in the annual report, during the effective period of the Administrative Order.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to ensure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Sincerely,

John T. Dunn, P.E.

LR BEMION for

Deputy General Manager/Chief Engineer